

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)
)
v.)
)
\$4,790.00 IN UNITED STATES)
CURRENCY; \$19,169 IN)
UNITED STATES CURRENCY;)
AND VARIOUS JEWELRY,)
)
Defendants.)

VERIFIED COMPLAINT FOR FORFEITURE IN REM

Comes now the United States of America, by and through its counsel, Prim F. Escalona, United States Attorney for the Northern District of Alabama, and Kristen S. Osborne, Assistant United States Attorney, and respectfully shows the Court the following in support of its Complaint for Forfeiture:

1. This is a civil action *in rem* for the forfeiture of \$4,790.00 in United States Currency, \$19,169.00 in United States Currency, and Various Jewelry as described below (hereinafter known collectively as "Defendant Items") per 21 U.S.C. § 881(a)(6).
2. The Court has jurisdiction over this subject matter per 28 U.S.C. §§ 1345 and 1355.
3. This Court has *in rem* jurisdiction over the Defendant Items per 28

U.S.C. § 1355.

4. This Court has venue over this action per 28 U.S.C. §§ 1355 and 1395.

Factual Background

5. In or about August of 2022, Eric Williams, a resident of McCalla, in the Northern District of Alabama, was under investigation by the Drug Enforcement Agency (DEA) and partnering law enforcement. Williams was suspected of receiving cocaine from a source in Mexico, and distributing it in Birmingham, Alabama; Montgomery, Alabama; Atlanta, Georgia; and Spartanburg, South Carolina.

6. On August 10, 2022, Williams was observed traveling from Birmingham to Union City, Georgia, where he stayed overnight at a hotel. On August 11, 2022, law enforcement observed Williams' vehicle, a Ford Explorer, exit the hotel grounds and begin traveling north on I-85 towards downtown Atlanta, Georgia.

7. Surveillance of Williams revealed he continued to travel north through Atlanta, ending in Spartanburg. Law enforcement in Spartanburg observed the vehicle parked in front of a trailer. Williams and two Hispanic males were present. When approached by law enforcement, one of the Hispanic males stated they were all waiting for a truck to arrive to load and transport the trailer. Following a positive

hit by a drug-sniffing K-9, Williams and the accompanying individuals were detained while Williams' vehicle and the trailer were searched.

8. During the search of Williams' Ford Explorer, law enforcement identified a hidden compartment under both the driver's seat and front passenger but no drugs inside of the vehicle. A search of the trailer yielded 7 kilograms of cocaine in a plastic bag placed between pallets of expired fruit. Williams and two other individuals were arrested for possession of cocaine on August 11, 2022.

9. On August 12, 2022, law enforcement observed Williams' second vehicle, a Dodge Challenger, leave Birmingham, Alabama, and travel to same hotel in Union City, Georgia, where Williams previously stayed. The vehicle returned to Birmingham later that same day.

10. In recorded jail phone calls beginning on August 12, 2022, Williams called his girlfriend, Melanie Benjamin, and asked if she had acquired the money from his hotel room in Union City, Georgia. Benjamin verified that she had done so. Williams also instructed Benjamin to remove weapons and currency from his residence in McCalla. Benjamin also replied that she had done so.

11. Following Williams' arrest, on August 13, 2022, law enforcement executed a state search warrant at his residence in McCalla, AL, that resulted in the seizure of 6 guns, 18 cellphones, jewelry, and approximately 1176.9 grams of an

unknown substance.

12. Also on August 13, 2022, Melanie Benjamin, known to law enforcement to be Williams' girlfriend, was under surveillance. At the time of this surveillance, she was operating a Dodge Challenger that belonged to Williams.

13. Law enforcement observed Benjamin exit the Dodge Challenger at an address on Bessemer Road in Birmingham and enter a Nissan Rogue with two other females and begin traveling in the Rogue. A lawful traffic stop of the Rogue was conducted where all occupants gave permission for a consensual search of the vehicle. Law enforcement found **\$4,790.00 of United States Currency** in Benjamin's purse inside the Rogue.

14. In a subsequent interview with law enforcement, Benjamin gave permission for officers to search the Dodge Challenger which she had been driving. A backpack with **\$19,169.00 in United States Currency** was found in the trunk of the Challenger.

15. A shoebox with **Various Jewelry** was also found in the trunk of the Challenger. This includes three items, which were appraised by an expert and described as:

<u>Description</u>	<u>Approximate Value</u>
10K Yellow Gold Diamond Ring, 168 single cut diamonds, estimated total 0.84 carats.	\$1,386.00
10K Yellow Gold Curb Link Necklace, 36.5 inches	\$3,630.00

<u>Description</u>	<u>Approximate Value</u>
long, 0.75 inches wide.	
10K Yellow Gold Curb Link Necklace, 30.75 inches long, 5/8 inches wide.	\$2,585.00

Applicable Law

16. Defendant Items are subject to forfeiture per 21 U.S.C. § 881(a)(6) as moneys furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of Title 21 of the United States Code, Chapter 13, Subchapter I, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of Title 21 of the United States Code, Chapter 13, Subchapter I.

17. The names and addresses of possible claimants known to the United States are as follows:

Melanie Benjamin 800 12 th Ave. Birmingham, AL 35228	Eric Williams 4729 Longmeadow Drive Bessemer, AL 35022
4729 Longmeadow Drive Bessemer, AL 35022	800 12 th Ave. Birmingham, AL 35228
	Spartanburg County Detention Center 95 California Avenue Spartanburg, SC 29303
John C. Robbins, Esq. Robbins Law	

2031 2nd Avenue North Birmingham, AL 35203	
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WHEREFORE, the Plaintiff requests that due notice issue to enforce the forfeiture and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed; that the named Defendant Items be condemned and forfeited to the United States of America for disposition according to law; and for such other and further relief as this Court may deem just and proper.

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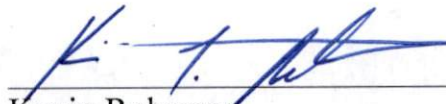
VERIFICATION

I, Kevin Roberson, am a Special Agent of the Drug Enforcement Agency (DEA) and the agent assigned responsibility for this case. I have read the contents of the foregoing Complaint for Forfeiture *In Rem*. The statements contained therein are true to the best of my knowledge and belief. I base my knowledge for this verification of the Complaint for Forfeiture *In Rem* on the following:

- a. Information provided to me by other law enforcement officers who have participated in the investigation of Eric Williams, Melanie Benjamin, and other individuals described in this Complaint;
- b. My participation in the investigation prior to and following the seizure of the Defendant Items in this action; and
- c. My experience in investigations involving drug trafficking, and the experience of other law enforcement officers related to such investigations.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed 7th February 2023.



Kevin Roberson
Special Agent
Drug Enforcement Agency